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USPS CERTIFIED MAIL

April 7, 2016
Rick Sakow
U.S. EPA Region 9
75 Hawthorne St. (ENF-2-2)
San Francisco, CA 94105-3901

Request for Information In re: Phillips 66 Los Angeles Refinery – Carson
EPA Identification Number: CAD980881676
EPA Request Dated February 2, 2016

Dear Mr. Sakow:

This letter and the enclosed documents provides Phillips 66 Company's ("Phillips 66") response to your agency's February 2, 2016 Request for Information ("EPA Request"). The EPA Request seeks documents responsive to 13 categories of information. These 13 categories of documents are listed below, along with Phillips 66's response. Because some of the terms used in the EPA Request are not clearly defined or defined at all, where appropriate Phillips 66 has provided its understanding of what it believes is being sought by the EPA Request and responds accordingly.

Please note that this letter and the enclosed documents contain confidential business information, trade secret information, business proprietary information, and/or information otherwise exempt from public disclosure due to the confidential nature of the information (referred to herein as "CBI"). This CBI has been handled internally by Phillips 66 on a generally-confidential basis and we do not believe that the enclosed CBI is in the public domain. If and when this or similar information must be disclosed externally by the Company, the release of the information is burdened with appropriate safeguards, such as written confidentiality agreements or claims of trade secret/confidential information. Further, public disclosure of the CBI would result in significant economic harm to Phillips 66 and compromise its competitive position within the marketplace. Accordingly, Phillips 66 has marked the CBI as "CONFIDENTIAL" in the enclosed documents and requests that the U.S. Environmental Protection Agency and its staff (collectively referred to herein as "EPA"), as well as its contractors and agents, manage and protect the CBI in accordance with applicable law, including but not limited to the Section 3007(b) of the Resource Conservation and Recovery Act, 40 C.F.R. sec. 2.203(b), and EPA regulations and guidance.

Public release of the drawings marked as "CONFIDENTIAL" would harm Phillips 66 for the following reasons. Phillips 66 and/or its predecessor companies have developed or procured (at significant effort and cost to ourselves) certain Piping and Instrumentation Diagrams, Plot Plans,

Maps, etc., that contain proprietary data. If this proprietary data was provided to our peers/competitors, Phillips 66 would be put at a competitive disadvantage from an operating/profitability standpoint in that our peer/competitors could duplicate our designs, processes, and layouts without having to spend the effort, time, or cost to develop and/or procure such data for their use. We request that this information be managed as CBI by EPA for a minimum of 10 years. Drawings similar to these have been labeled as CBI by Phillips 66 when disclosed to other government agencies, including but not limited to the South Coast Air Quality Management District, the Bay Area Air Quality Management District, the California Air Resources Board, and the California Department of Industrial Relations, Division of Occupational Safety and Health.

Category No. 1:

1. Sodium hydroxide-hypochlorite material

- a. EPA's reference to the material "sodium hydroxide" both above and below is incorrect. The correct name of the material is "sodium hypochlorite." We have made those changes in the recitation of the request and our response. On 8/24/2015, inspectors noted white, powdered residue that had built up within the secondary containment structure of the sodium hypochlorite portable black plastic tank at the LARC Less Than 90 Day Hazardous Waste Accumulation Area (HWAA), as shown in the photographs below. Please provide any waste determination information and/or analysis, if available, for this material.

Response

Phillips 66, based on process knowledge, identified the material in the black plastic tank as non-hazardous sodium hypochlorite (bleach). Please see MSDS for the subject material under "Exhibit 1a" folder.

- b. If the secondary containment and tank has been cleaned and the clean-up material disposed off-site since the inspection, please provide a copy of any outgoing shipping documents (e.g., manifests) for this material. Also, provide a copy of the Waste Profile developed for this waste.

Response

Phillips 66 water-rinsed the tank and secondary containment. The rinse material was collected in the refinery process sewer system.

- c. If the secondary containment and tank have not been cleaned, please provide a reason.

Response

N/A – See response to questions 2b above.

Category No. 2:

2. Spent Carbon (O.R.U.) TK-1620

- a. On 8/24/2015, inspectors noted two unlabeled 55-gallon single scrubber containers at the LARC HWAA. Mr. Rob Martinez of Brinderson applied hazardous waste labels to the two unlabeled containers and marked them "Spent Carbon (O.R.U.)

TK-1620" with an accumulation start date of 6/30/2015. Please provide any waste determination information and/or analysis, if available, for this material.

Response

Please see document(s) under "Exhibit 2a" folder. The spent carbon chain of custody (COC) number (143113) enclosed references "Envent Drums-HWAA" and not "O.R.U. TK-1620." However, the chain-of-custody document was inadvertently mislabeled by the contractor, Robert Martinez of Brinderson. We have since confirmed with Mr. Martinez that the chain-of-custody document and associated data is for the two unlabeled containers that are the subject of this Category No. 2, despite being identified as "Envent Drums-HWAA" rather than "O.R.U. TK-1620."

- b. Please describe how this material was disposed. If the material was shipped off-site, provide a copy of the shipping document(s) (i.e., manifest, bill of lading). If the material has not been shipped off-site, please describe how the material was managed by LARC.

Response

Phillips 66 shipped the material off-site. Please see document(s) under "Exhibit 2b" folder.

Category No. 3:

3. TK-42

- a. On 8/25/2015, inspectors noted waste piles on the surface of the heat exchanger bundle cleaning pad. Mr. Ed Ascendo stated the material was placed on the pad by a HydroChem vacuum truck after the clean-out of TK-42. Please provide any waste determination information and/or analysis, if available, for this material.

Response

Please see document(s) under "Exhibit 3a" folder.

- b. Please describe the materials / waste streams held in TK-42.

Response

Tank 42 has been empty and out of service since 2008 and, therefore, it did not hold or otherwise contain materials/waste streams. Phillips 66 was recently prepping the tank to put it back in service by sandblasting the interior, which resulted in the material observed on the heat exchanger bundle pad.

- c. Please describe how this material was managed by LARC. If the material was shipped off-site, provide a copy of the shipping document(s) (i.e., manifest, bill of lading). If the material has not been shipped off-site, please describe how the material was managed by LARC.

Response

Please see document(s) under "Exhibit 3c" folder.

- d. If known, please state how long the material had accumulated on the HEB cleaning pad, prior to being transferred to the HWAA.

Response

Phillips 66 estimates the material was on the HEB cleaning pad for approximately one hour.

Category No. 4:

4. Flasher Waste from FR-5

- a. On 8/24/2015, inspectors noted three 55-gallon containers on a pallet at the LARC HWAA. One of the containers had a hazardous waste label which read "Sludge from FR 4,5,6" with an accumulation start date of 3/19/2015. The other two containers were unlabeled. Mr. Rob Martinez of Brinderson stated that the two unlabeled containers also held flasher exchange waste from FR-5. Please provide any waste determination information and/or analysis, if available, for this material.

Response

Phillips 66 assumes that EPA's reference to "Sludge from FR 4,5,6" refers to the waste in EPA photograph "IMG0183.JPG." The label states "Sludge from FR 4, 5, 6 Exchanger" with an accumulation start date of 8-19-15, not 3/19/2015 (i.e., leading us to believe that the question above has a typographical error). Based on that understanding, please see document(s) under "Exhibit 4a" folder.

- b. Please describe how this material was managed by LARC. If the material was shipped off-site, provide a copy of the shipping document(s) (i.e., manifest, bill of lading). If the material has not been shipped off-site, please describe how the material was managed by LARC.

Response

Phillips 66 shipped the material off-site. Please see document(s) under "Exhibit 4b" folder. Please be advised that the chain of custody (COC) numbers (143109 and 143581) referenced on the manifest provided do not have the COC number (143114) provided in our response to Category No. 2. The contractor, Robert Martinez of Brinderson, informed us that he did not put the COC number 143114 on the manifest, but the material from FR 4, 5, 6 was shipped out under the supplied manifest.

- c. Please describe the equipment and source(s) that generated this flasher waste.

Response

FR 4,5,6 are heat exchanger bundles in the Vacuum Flasher Unit.

Category No. 5:

5. Cutting Oil

- a. On 8/24/2015, inspectors noted a stream of black, oily liquid draining into an unlined surface impoundment located north of TK-12 and abutting Flares 5A-6 and SA-4, as

shown in the photos below. LARC personnel stated that the liquid was cutting oil used to flush a pipe.

Response

Although 5(a) does not request information or documents and, therefore, no response is needed, Phillips 66 provides the following information. Three days prior to the inspection, refinery personnel were removing a 10-inch deadleg from resid service. They flushed the deadleg with cutter stock and pushed the material from the deadleg with pressurized nitrogen, which inadvertently resulted in a spill to ground. Refinery personnel utilized absorbent to clean-up the spill, but some of the material remained visible at the commencement of the inspection, which was subsequently cleaned up. This material did not result from an operational discharge; rather, it was the result of actions taken to clean up an accidental release.

- b. Please describe how this material was managed by LARC. If the material was shipped off-site, provide a copy of the shipping document(s) (i.e., manifest, bill of lading). If the material has not been shipped off-site, please describe how the material was managed by LARC.

Response

Phillips 66 shipped the material generated from the cleanup off-site. Please see document(s) under "Exhibit 5b" folder.

- c. Please provide a Safety Data Sheet for the cutting oil.

Response

Please see document(s) under "Exhibit 5c" folder.

Category No. 6:

6. Coker & Oil Recovery Unit

- a. Please provide narrative description and a detailed schematic flow diagram of the oil recovery unit processes and the wastewater system. EPA requested this information during the inspection and LARC's 10/2/2015 response references the wastewater permits, which do not adequately detail the processes.

Response

The Carson Plant oil recovery unit provides primary treatment of refinery-generated oily waste waters. The largest volume stream comes from five desalters in the crude unit in which hot water and steam are used to remove salts and inorganics from the crude by direct contact. Approximately 300 gpm of oily water is generated from this process. The composition is typical of refinery wastewaters and includes low levels of free oil and dissolved constituents from crude, including BTEX, polynuclear aromatics, metals and salts. Waters from the desalters are routed to a Corrugated Plate Interceptor (CPI) box where free oils are separated using inclined plates that slow the flow and enhance gravity separation. The recovered oil is sent to tankage and is reprocessed in the refinery via distillation.

Refinery wastewaters from other processes are treated in two CPI boxes: one for the hydrotreating and sulfur recovery units and one for the delayed coking unit. These waste waters vary in composition, but the constituents are essentially the same as described above. The flows from hydrotreating/sulfur recovery are approximately 150 gpm, and approximately 200 gpm come from coker wash water.

All wastewater potentially containing residual oil is routed to the ORU inlet where it is pumped to a large equalization tank. Incidental oil separation occurs in this tank and the oil is periodically pumped to the recovered oil tanks. Two API separators are used to remove additional oil and sludges. The API separators work similarly to the CPI boxes in that gravity separation occurs in a unit designed to slow the flow to relatively quiescent conditions. Sludge is sent to the coker and oils are recovered and sent to the same tank system as the oil recovered from the CPI boxes. The API effluent is processed in Dissolved Gas Flotation Units (DGFs) where micro nitrogen bubbles are used to uplift colloidal material into a float layer. This layer is skimmed off and is also processed in the coker to produce coke.

The oil recovery unit at the Carson Plant does not provide secondary wastewater treatment. The effluent is discharged to the Los Angeles County Sanitation District POTW under a permit with limitations on oxygen demand, oil and grease, sulfur compounds and certain metals.

Waters free of oils that contain dissolved sulfur compounds generated in other areas of the plant are treated in sour water strippers to remove the sulfur and ammonia compounds into a gas phase. Some of the stripped water is treated with carbon absorption to remove selenium. All of the combined stripped sour water is blended with oil recovery unit water and discharged to the Los Angeles County Sanitation District POTW.

Please see document(s) under "Exhibit 6a" folder.

- b. Please provide a list of all oil-bearing hazardous secondary materials that are inserted into the oil recovery unit and/or the coker.

Response

The oil recovery unit receives oily wastewater from process units. The material inserted into the coker for oil recovery includes API Separator Sludge, DAF/DGF Float, and Oil Bearing Tank Bottoms (from both Carson and Wilmington Plants). Occasionally we may receive very small amounts of oil-bearing secondary material from other Phillips 66 facilities in California.

- c. Please describe how LARC keeps records of the oil-bearing hazardous secondary materials that are inserted into the oil recovery unit and/or the coker.

Response

Twice a shift operators (during their rounds) track sludge to coker process information (i.e. pumping data, tank level data, coke drum #1 insertion data, etc.).

- d. If available, please provide copies of vacuum truck logs for all shipments of oil-bearing hazardous secondary materials from the LARW facility to LARC from 1/1/2012 to 8/25/2015.

Response

Phillips 66 is uncertain as to the meaning of the phrase “vacuum truck logs.” We assume that EPA desires copies of shipping papers relating to the transportation of oil-bearing hazardous secondary materials from the refinery’s Wilmington Plant to the refinery’s Carson Plant. Based on this assumption, Phillips 66 responds as follows. Phillips 66 maintains bills of lading for shipment of oil-bearing hazardous secondary materials via vacuum truck from the Wilmington Plant to the Carson Plant. However, there are approximately 1,000 such bills of lading for the time period requested by EPA and they are stored co-mingled with other bills of lading maintained at the refinery. It would be extremely burdensome to go through each month dating back to the beginning of 2012 to identify, retrieve, and copy the specific bills of lading requested by EPA. However, we did identify, retrieve, and copy the bills of lading during the month of EPA’s inspection to provide an example of that documentation for the agency. In addition, we are providing a spreadsheet report that tabulates all such movements of oil-bearing hazardous secondary materials from the Wilmington Plant to the Carson Plant from 1/1/2012 to 8/25/2015. These documents are in the “Exhibit 6d” folder.

- e. Please describe the frequency in which LARC analyzes its coke product to ensure the coke is non-hazardous for benzene. Please include a copy of the most recent analysis conducted prior to the 8/24/2015 compliance evaluation inspection.

Response

Phillips 66 does not routinely or periodically analyze the coke product produced at the LAR Carson Plant. Based on our extensive experience both at the Los Angeles Refinery and our other company refineries, we know that benzene does not survive the coke production process and is not present in the coke produced at the LAR Carson Plant. In addition, EPA recognizes that benzene present in materials undergoing the coking process will not survive that process. See e.g., 63 Fed. Reg. 42110, 42121-26 (Aug. 6, 1998) and Notice of Data Availability Response to Comment Document, Part II, June 1998, U.S. EPA, page II-11. In summary, we know that benzene will not be present in the coke and, therefore, there is no reason (or requirement) to test for benzene.

Category No. 7:

7. Temporary Heat Exchanger Bundle Cleaning Pads

- a. Please provide a list of all operations that occur at the temporary heat exchange bundle cleaning pad (pad) located at the HWAA. Please provide a list of the different types of equipment cleaned and materials / wastes placed on this pad. Please include the associated RCRA hazardous waste codes for each waste stream generated during a cleaning operation, if applicable.

Response

A portion of the HWAA is utilized as a temporary heat exchanger cleaning pad during periods in which two or more heat exchanger bundles and their

components (e.g., channel heads, floating heads, and dollar plates) are to be cleaned in a short period of time. This is almost always associated with a process unit Turnaround in which one part of the refinery undergoes a planned shutdown for maintenance. The duration of a typical Turnaround is 3-5 weeks with scope that typically includes maintenance on 10 or more heat exchangers. RCRA waste streams generated during the cleaning operation is usually F037, K050. Carson has a consolidated TSDF refinery sludge profile with RCRA codes F037, K050 and K051.

Operations and Types of Equipment Cleaned (when utilized as a temporary heat exchanger cleaning pad).

- Types of Equipment: An exchanger bundle and its components, the channel head and dollar plate, and its floating head (if equipped). U-tube bundles do not have a floating head.
 - In almost all cases, a bundle is pulled from its shell at the process unit, then transported to the pad for cleaning. The shell remains in place at the unit. In rare situations, the entire exchanger is removed and transported to the pad for cleaning, including its shell.
 - At the pad, the exchanger is cleaned using high pressure water (hydroblasting). Soap is often used to help with the cleaning process. An exchanger bundle will have both its ID (inside of the tubes) and OD (outside of the tubes) hydroblasted.
 - The material being cleaned can differ between the ID and the OD. It can be both hydrocarbon based, in which hydrocarbon liquids/solids are being removed. For cooling water exchangers, either the ID or OD will have been in cooling water service. Cleaning here is to remove water scale. Some exchangers are in non-hydrocarbon based service (e.g., DEA, an amine).
 - In most cases, the exchanger cleaning effort is to allow inspection of the exchangers to confirm mechanical integrity. This inspection consists of various non-destructive techniques (IRIS inspection, Eddy Current inspection, visual inspections, ultrasonic measurements, or radiographs – x-rays). The clean exchanger is either inspected at the pad or at another location. In a few cases, if the exchanger is to be replaced, the cleaning is done to decontaminate the equipment for scrap.
 - Piping components (steel pipe, valves) that are removed from the unit during a Turnaround that are meant to be replaced (i.e., scrapped) can also be sent to the temporary exchanger cleaning pad for cleaning prior to being scrapped. However, in most cases, during a Turnaround, such components are sent to the Main cleaning pad for cleaning. This is to keep the temporary cleaning area dedicated for exchangers.
- b. Please describe all methods used to transport liquids and solids from this pad to the Oil Recovery Unit, HWAA waste management area and/or the coker. Describe the method (e.g., hard-piped, vacuum truck) of transferring liquids/solids to other facility operations.

Response

All liquids (oil, water, soap) are collected in a rental temporary tank that is piped to an area drain in the HWAA (that is within the designated boundary of the temporary exchanger cleaning pad). The tank is located on the road east of the HWAA and would sit inside a temporary secondary containment berm (also provided by the rental company). The liquids are then vacuum truck transported to the Oil Recovery Unit. Solids that are not washed/drained with the liquids are hand shoveled into 55-gallon drums for offsite disposal as K050 Hazardous Waste.

- c. Provide a copy of any written procedures LARC has developed that describes protocols for emptying wastes at this pad. If there are any written training related documents prepared by LARC for this task, provide a copy of the training materials.

Response

Phillips 66 utilizes contractors to manage the wastes at this pad and, therefore Phillips 66 does not have any written procedures or training materials specific to this task that it has developed. However, Phillips 66 has a facility-wide procedure relating to hazardous waste disposal that all employees and contractors are required to follow when working at LAR. Please see the document under "Exhibit 7c."

- d. Provide the date prior to EPA's 8/24/2015 compliance evaluation inspection that this pad was used to clean a heat exchange bundle.

Response

Prior to 8/24/15, the last time a portion of the HWAA was used for exchanger cleaning was the period from 3/17/14 to 4/4/14. This was the last process unit Turnaround conducted in the plant in which more than 10 exchangers needed cleaning as part of the turnaround scope.

- e. If LARC maintains maintenance records for cleaning this pad, please provide copies of the records from 1/11/2012 - 8/28/2015.

Response

There are no cleaning records for the HWAA when a portion of the area is used as a temporary exchanger cleaning pad. There is cleanup of the area on a daily basis throughout the duration of the Turnaround. Final cleanup of the pad would be part of completing the Turnaround project, which would include cleaning all residual materials/waste from the pad, the tank, the drain sump, and also the cleaning equipment itself (hydroblasting equipment).

Category No. 8:

8. Main Heat Exchanger Bundle Cleaning Pad

- a. Please list all operations that occur at the heat exchange bundle cleaning pad located immediately south of SB-4. Please provide a list of the different types of equipment cleaned and materials / wastes placed at this pad. Please include the associated RCRA hazardous waste codes for each, if applicable.

Response

The heat exchanger bundle cleaning pad located immediately south of SB-4 (main bundle cleaning pad) is used for cleaning exchanger bundles and their components (channel heads, dollar plates, floating heads) if it is for work not associated with a process unit Turnaround. It is also used for cleaning other types of equipment, such as pipes, valves, and fittings that were in service and removed for replacement. These are cleaned for scrap. Vacuum trucks that are to be cleaned of residual material (material in the tank of the truck) are rinsed and cleaned at this location before leaving the plant. Materials that have come in contact with oil, but intended for re-use (e.g., scaffold material), are also washed on the main bundle cleaning pad.

- b. Please describe all methods used to transport liquids and solids from this pad to the Oil Recovery Unit, HWAA and/or the coker. Describe the method (e.g., hard-piped, vacuum truck) of transferring liquids/solids from the pad to other facility operations.

Response

Liquids (oil, water, soap) and any sludge that washes away with the liquids, drains into a CPI Box (Corrugated Plate Interceptor). Oil and water collected in the box is pumped to the Oil Recovery Unit. Oil is recovered and fed back into the Process Units. Sludge collected in the box is transported to the system that pumps sludge to the Coker for recycling. Solids that are not washed away with the liquids into the drain are shoveled into lined 55-gallon drums.

- c. Please provide a copy of any written procedures LARC has developed that describes protocols for emptying wastes at this pad. If there are any written training related documents prepared by LARC for this task, provide a copy of the training materials.

Response

Phillips 66 utilizes contractors to manage the wastes at this pad and, therefore Phillips 66 does not have any written procedures or training materials specific to this task that it has developed. However, Phillips 66 has a facility-wide procedure relating to hazardous waste disposal that all employees and contractors are required to follow when working at LAR. Please see the document previously provided under "Exhibit 7c."

- d. Provide the date prior to EPA's 8/24/2015 compliance evaluation inspection that this pad was used to clean a heat exchange bundle.

Response

The main bundle cleaning pad is generally used on a day-to-day basis, although on some days the pad is unused. Prior to 8/24/15, the last time the main bundle cleaning pad was used for exchanger cleaning was the period from 7/22/15 to 8/21/15. A set of three (3) exchangers from the Flasher unit (hydrocarbon service) was pulled for cleaning for inspection requirements. These exchangers were cleaned at the main bundle cleaning pad.

- e. If LARC maintains maintenance records for cleaning this pad, please provide copies of the records from 1/1/2012 - 8/28/2015.

Response

There are no cleaning records for the main bundle cleaning pad. While in use the pad is cleaned on a daily basis. If an exchanger cleaning job extends over the period of several days, the end of shift cleanup would consist of removal of solids and oil. A final cleanup of the pad would be part of completing the job, which would include cleaning all residual materials/waste from the pad, the drain trough, sump, and cleaning the equipment itself (hydroblasting equipment).

Category No. 9:

9. Additional Information Requested

- a. On 8/24/2015, inspectors noted black, petroleum-like staining on the banks and surfaces of the unlined surface impoundment located north of TK-12 and abutting Flares 5A-6 and SA-4. Please describe all known processes and sources which would discharge hydrocarbons into this surface impoundment.

Response

The unlined surface impoundment located north of TK-12 and abutting Flares 5A-6 and SA-4 is used for stormwater retention only. There are no known processes or sources to Phillips 66 that would discharge hydrocarbons into this surface impoundment. Because the surface impoundment is used for stormwater retention only, Phillips 66 does not analyze the water for benzene. There has, however, been two instances known to Phillips 66 where materials other than stormwater were discharged into the surface impoundment:

- On 8/15/2015, an out-of-service 10-inch line from the RA area to Flasher was in the process of being emptied and blinded. It developed a leak at three locations and at one of the locations the leak could not be contained, which inadvertently resulted in a spill to ground; and
- On 12/29/2014, 15 gallons of oil overflowed from diversion box #2 into the surface impoundment.

On both occasions, the hydrocarbon materials, including some oil-contaminated soil, were promptly cleaned up and properly disposed of.

- b. Please state whether or not LARC has analyzed any of those discharges into this surface impoundment for benzene. If such monitoring has occurred, please provide copies of the associated reports or records developed from 1/1/2012 - 8/28/2015.

Response

No samples of the above-described discharges were taken or tested for benzene. This impoundment is for storm water only and any release of hydrocarbons due to a spill is promptly cleaned up. Any benzene contamination would not be accumulated in the impoundment.

- c. Please provide any waste determination information and/or analysis, if available, for the petroleum material remaining in the surface impoundment.

Response

N/A – No petroleum material is allowed to remain in the impoundment.

Category No. 10

10. Please provide a copy of the Exception Report for Manifest # 013004309 JJK, dated 11/14/2014. LARC's 10/16/2015 response to EPA did not include a copy of the Exception Report.

Response

Phillips 66 does not have an exception report for manifest 013004309 JJK. Phillips 66 obtained a copy of the TSDF (11/19/14) signed manifest. A copy of the TSDF (11/19/14) signed manifest is included with this response. Please see document under "Exhibit 10" folder.

Category No. 11:

11. LARC's Post Closure Plan for the permitted and closed Process Water Pond states the following:

"Bulk Operations personnel work in the vicinity of the PWP on a daily basis. Should any cracks form in the asphalt cover, or should precipitation runoff not occur appropriately, Bulk Operations will inform the Environmental Services department through the existing, refinery-wide incident reporting procedures."

Please provide any copies of Operators Logs or other documentation which demonstrates that inspections of the closed Process Water Pond have occurred within the last 5 years. If such inspections have not occurred, please confirm.

Response

For more than 5 years, operations personnel have conducted one inspection per shift (two inspections per day) of the closed Process Water Pond. Phillips 66 is providing one month of inspection records (August 2015, which was the month during which the EPA inspection occurred) to evidence and demonstrate that these inspections occur on regular and frequent basis. Please see document(s) under "Exhibit 11" folder.

Category No. 12:

12. Please provide copies of the inspection records for the LARC hazardous waste accumulation areas from January 2012 to August 2015.

Response

Please see document(s) under "Exhibit 12" folder. Please be advised that we are missing reports from 9/7/13 to 12/27/13. We are confident that these inspections occurred, and that the records were reviewed by DTSC during the hazardous waste inspection conducted May 5 -7, 2015. We have not been able to locate these specific reports following the DTSC review, however.

Category No. 13

E160117.docx

LARC – 2015 EPA Inspection
2016 Response to Additional Information Request

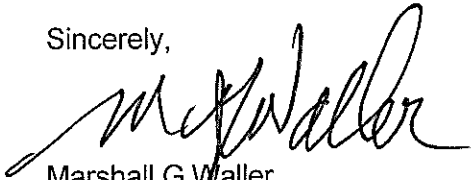
13. Please provide copies of manifests for all shipments of F-listed and K-listed hazardous wastes sent from LARC to a permitted treatment, storage and disposal facility from 1/1/2012 to 8/24/2015.

Response

Please see document(s) under "Exhibit 13" folder.

If you have any questions, please contact Cheryl Cobb at (310) 952-6210.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Waller", written over the printed name.

Marshall G Waller
Environmental Director